

EXHIBIT B

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

15 TELESOCIAL INC.,

CASE NO. 3:14-CV-3985-JD

16 Plaintiff,

17 v.

18 ORANGE S.A., a French Corporation;
19 ANNE BENRIKHI, an individual;
20 DIMITRI DELMAS, an individual;
21 OLIVIER GODINIAUX, an individual;
22 GUILLAUME GUIMOND, an individual;
23 FABRICE PETESCH, an individual;
24 JACQUES VIEL, an individual;
25 BARBARA BOBILLIER, an individual;
26 BENOIT AMET, an individual;
27 THOMAS LESENECHAL, an individual;
28 FLORIAN DE SA, an individual;
and ANTOINE LECOUTTEUX, an individual;
SYLVAIN JAUDRY, an individual,

Defendants.

**REQUEST FOR INTERNATIONAL
JUDICIAL ASSISTANCE PURSUANT TO
CHAPTER II OF THE HAGUE
CONVENTION OF 18 MARCH 1970 ON
THE TAKING OF EVIDENCE ABROAD
IN CIVIL OR COMMERCIAL MATTERS**

1 A request is hereby made by the United States District Court for the Northern District of
2 California to the Ministère de la Justice, Direction des Affaires Civiles et du Sceau, Bureau de l'entraide
3 civile et commercial international (D3), 13, Place Vendôme, 75042 Paris Cedex 01, France, for
4 assistance in the above-captioned action in obtaining the deposition testimony of individuals located in
5 France. This request is made pursuant to Chapter II of the Hague Convention of 18 March 1970 on the
6 Taking of Evidence in Civil or Commercial Matters (the "Hague Convention"):

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9 1. Sender

The Honorable James Donato
United States District Judge
United States District Court
Northern District of California
San Francisco Courthouse, 19th Fl., CR 11
450 Golden Gate Avenue
San Francisco, CA 94102
United States of America

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16 2. Central Authority of the Requested State

Ministère de la Justice
Direction des Affaires Civiles et du Sceau
Bureau de l'entraide civile et commercial
international (D3)
13, Place Vendome
75042 Paris Cedex 01
France

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21 3. Person to whom the executed request is to be
22 returned

Michael Page
Durie Tangri LLP
217 Leidesdorff Street
San Francisco, California, 94111

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28 This Court asks that the executed request be
returned to Mr. Page as soon as possible.

4. In conformity with Chapter II, Article 17 of the
Convention, the undersigned Applicant has the
honor to submit the following request:

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2 5(a). Requesting judicial authority

United States District Court
Northern District of California
San Francisco Courthouse, 19th Fl., CR 11
450 Golden Gate Avenue
San Francisco, CA 94102
United States of America

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5 5(b). To the competent authority of

The Republic of France

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7 6. The names and addresses of the parties to the
8 proceedings and their representatives

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10 6(a). Plaintiffs

Telesocial Inc.
5 Funston Ave.
San Francisco, CA 94129

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14 Represented by:

15 Benjamin L. Singer
16 Renee B. Bea
17 Douglas S. Tilley
singer / bea LLP
18 601 Montgomery Street, Suite 1950
San Francisco, California, 94111
United States of America

19
20 -and-

21 Todd Briggs
22 Quinn Emanuel Urquhart & Sullivan, LLP
555 Twin Dolphin Drive, 5th Floor
23 Redwood Shores, CA 94065
United States of America

24
25 6(b) Defendant

Orange, S.A.
78 Rue Olivier de Serres,
75015 Paris,
France

26
27 Represented by:

28 Michael H. Page
Durie Tangri LLP

217 Leidesdorff Street
San Francisco, California, 94111
United States of America

-and-

Daniel Schimmel
Foley Hoag LLP
1177 Avenue of the Americas
New York, New York, 10036
United States of America

7. The nature and the purpose of the proceedings and summary of the facts

Plaintiff Telesocial Inc. ("Telesocial") is a tech start-up founded in 2008 which developed a software application known as "Call Friends."

Defendant Orange, S.A. is a French telecommunications provider; the individually-named defendants are persons associated with Orange (“Orange”).

In 2012, Orange and Telesocial began discussions about a possible business deal involving the “Call Friends” application. The parties never reached agreement as to an ongoing business relationship. Telesocial filed the Complaint initiating the instant action on September 2, 2014, which it amended on December 15, 2014 (the “Amended Complaint”). In its Amended Complaint, Telesocial alleged that Orange and the various individual defendants improperly obtained access to and copied Telesocial’s technology, and other related claims. By its answer of May 12, 2015, amended on June 19, 2015, Orange denied that it used, copied, or reverse-engineered Telesocial’s technology, in addition to other defenses. Discovery is ongoing. On May 6, 2016, the District Court entered the Second Amended Scheduling Order, providing a fact discovery deadline of September 30, 2016.

8. Evidence to be obtained

The parties seek permission to take the oral deposition testimony of individuals residing in France.

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| 1 | 9. Identity and address of person to be Examined | Benoît Amet, Anne Benrikhi, Laurent Castaignet, Guilhem Caumel, Dimitri Delmas, Emmanuelle Desodt, Olivier Godiniaux, Jonathan Gourdin, Guillaume Guimond, Bertrand Guisnet, Antoine Lecoutteux, Catherine Le Drogo Ferrari, Frédéric Martelli, Xavier Perret, Fabrice Petesch, and, Philippe Streiff. |
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| 7 | 10. Subject matter about which the person is to be examined | Each individual's knowledge concerning the claims in Telesocial's Amended Complaint and Orange's defenses thereto. |
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| 10 | 11. The name of any of the parties, or their representatives, who plan to attend the deposition | Benjamin Singer, Renee Bea and others from Singer/Bea LLP, and Todd Briggs and others from Quinn Emmanuel, on behalf of Telesocial, and Daniel Schimmel and Anthony Mirenda and others from Foley Hoag LLP, on behalf of Orange. |
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| 12 | 12. The names, address, and telephone numbers of the stenographer and interpreter who have been selected, if any | |
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| 14 | 13. Whether the parties to the case have consented to the deposition, and if not, the reasons for any objection which has been made | The parties have consented to the depositions. |
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| 16 | 14. A suggested date for the depositions, if there is a preference | Various dates between June 22 - September 22, 2016 |
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| 18 | 15. Any requirement that the evidence is to be given on oath or affirmation, and any special form to be used | All evidence shall be given under oath, under penalty of perjury. |
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1 16. Any special methods or procedures to be
2 followed

The Commissioner, the parties' representatives, attorneys, interpreters, and a stenographer and a videographer will be permitted to be present during the deposition; the stenographer will be permitted to record verbatim the examination; attorneys for the parties will conduct the examination; witness examinations by attorneys for the parties will be conducted orally. The parties request that transcription of the deposition be in English.

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8 17. Specification of privilege or duty to refuse to
9 give evidence under the law of the State or origin

Witnesses may refuse to answer a question where doing so would disclose a privileged communication with counsel or where doing so would disclose work performed under the direction of an attorney.

12 18. Authority appointing Commissioner, pending
13 approval of the Ministère de la Justice

United States District Court
Northern District of California
San Francisco Courthouse, 19th Fl., CR 11
450 Golden Gate Avenue
San Francisco, CA 94102
United States of America

17 19. Commissioner

Shelle Higgins, CSR 10455, CLVS or others from
European Court Reporting
18 Chemin de la Croix Saint Jerome
77123 Noisy-sur-Ecole
France
Tel. 33 (0)977 197 098

21 20. The costs of the Hague Convention
22 proceedings, including, without limitation, the fees
23 of the Commissioner and the translation fees or
24 costs, will be borne by

The party identified in 6(a), but each party will be responsible for the fees and expenses, if any, of its own attorneys relating to the Hague Convention proceedings.

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4 HONORABLE JAMES DONATO
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6 UNITED STATES DISTRICT JUDGE
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Dated: _____